## McDermott Will&Emery

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> EPA Region 5 Records Ctr. 262721

June 23, 2006

## VIA MESSENGER

Mr. Mazin Enwiya Remedial Project Manager U.S. Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Re: Ellsworth Industrial Park Site Downers Grove, Illinois

## Dear Mazin:

Enclosed on behalf of Rexnord Industries, Inc. are copies of documents responsive to the U.S. Environmental Protection Agency's June 12, 2006 letter directed to Bruce White as Project Coordinator for the above referenced matter. In particular, I have enclosed the following:

- CD ROM containing the June 13, 2006 Expert Report of Ronald Frehner in Muniz v. Rexnord et al. (including the data report describing the supplemental data collected by Rexnord on the 2324 and 2400 Curtiss property in early 2006);
- Rudolph Fuys' October 19, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Jim Burkett's October 27, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Art Nutzorn's October 27, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Steve Vallino's October 28, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Edward Komrska's October 28, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;

- Building Schematics produced by Rexnord Industries, Inc. in Muniz v. Rexnord et al. bates labeled RX 002016 to RX 002078;
- Rexnord Industries, Inc.'s August 9, 2004 Responses to Plaintiffs' First Set of Interrogatories in Muniz v. Rexnord et al.;
- Rexnord Industries, Inc.'s September 30, 2005 Answers to Plaintiff's First Set of Interrogatories in Pote v. Ames Supply Co, et al.;
- CD ROM, dated May 22, 2006, containing investigation reports undertaken by the Muniz Joint Defense Group in April and May 2006;
- CD ROM containing investigation documents from the Magnetrol property bates labeled MSG MAG PII 000001 001789);
- CD ROM containing investigation documents from the Ames property bates labeled FUS002171 FUS002426;
- CD ROM, dated April 2006, containing supplemental investigation data provided by the Downers Grove Sanitary District; and
- May 10, 2006 letter from Meckler Bulger & Tilson containing survey and elevation data from the Ames' property.

Let me know if you have any questions.

Sincerely,

Mark A Bilut

Enclosures

cc: Thomas J. Krueger, Esq. (via U.S. Mail w/o encl.)

Todd R. Wiener, Esq. (w/o encl.)

CHI99 4649129-1.054265.0027